

(3P)
4/10/00

RE: Brady L. Davis v. All Defendants listed in complaint CV-00490 & CV-00543
Plaintiff's request for Production of Documents.

Pursuant to Rule 34, Fed.R.Civ.P. the plaintiff requests that the defendants produce the documents listed herein within (30) days, either by providing the plaintiff with copies, or by making them available to the plaintiff for inspection and copying.

1. Any and all grievances, complaints, or documents received by the defendant or their agents at Coal Township concerning mistreatment of inmates by defendants Fox, Henning Zelinski, and all others that is in these complaints and any memoranda, investigative files, or other documents created in response to such documents, since 1993, to the date of your response.

2. Any and all policies, directives, or instructions to inmates concerning a class (1) misconduct for having excessive commissary.

3. Any and all policies, directives, or instructions to staff governing sick call procedures, both in general population and in segregation.

4. All sick call requests sheets from the period of May 16, 1998, to the date of your response.

5. The plaintiff's complete medical records from May 16, 1998, to the date of your response.

6. Any logs, lists, or other documentations reflecting grievances filed by Coal Township inmates from May 16, 1998 to the date of your response.

7. Any and all documents created by any Coal Township staff member in response to a grievance filed by the plaintiff on May 16, 1998, concerning his medical care and harassment.

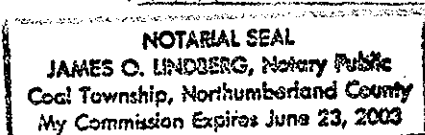
8. Any and all documents concerning Officer Fox, and Officer Henning's fight on Thanksgiving Day, 1999 in the inmates dining room.

9. I am requesting for Officer Fox's work schedule from 8/12/99 to 8/24/99.

Respectfully submitted,

Brady Davis
Brady Davis
BX-3685
One Kelley Drive
Coal Township, PA
17866-1021

DATED: APRIL 7, 2000



James O. Lindberg

March 30, 2000

TO: Superintendent Gillis
FR: Brady Davis, BX-3685
RE: Discovery

Dear Mr. Gillis;

On 12/3/99, I was placed in isolation. The reason was relating to my phone conversation that I was having with my wife. I submitted an appeal, however, they were all sustained on all levels. I am now in the United States Court. I am requesting for a copy of that conversation, so that I may proceed with a criminal complaint. If you desire not to render this information, I will ask the court to compel you to allocate.

DISCOVERY NEEDED

1. How many grievance's Officer Fox has filed against him.
2. I need to see the policy that state's that an inmate can receive a class 1 misconduct for having excessive commissary.
3. I need to know how many misconduct hearings were conducted from 8-12-99 to 8-24-99, to determine if there was an illegitimate reason for Officer Fox not to rewrite the misconduct in the required time, which is (7) days after it has been discharged without prejudice.
4. I need the investigation report that was done on Officer Zelinski, so I will have the opportunity to discern.
5. I need to know how many grievances Officer Henning has against him.
6. I need a copy of the report that was submitted on Officer Fox and Officer Henning, when they were fighting in the inmate's dining room, Thanksgiving Day, 1999.

7. I need a copy of the letter my State Representative submitted to you requesting for my criminal background, because the D.O.C. states the only time an inmates record will be exhibited is when it is requested, and if it is allocated, and there is an incorrect statement, it would be corrected immediately. So please submit a letter to my State Representative, to correct your disassertion.

I was not incarcerated for possession of a controlled substance with intent to deliver. I was incarcerated for "constructed possession." There is a difference.

Please send me a copy of your correction immediately, so I can notify the Court that you replied at liberty, and there is no need for compelmment.

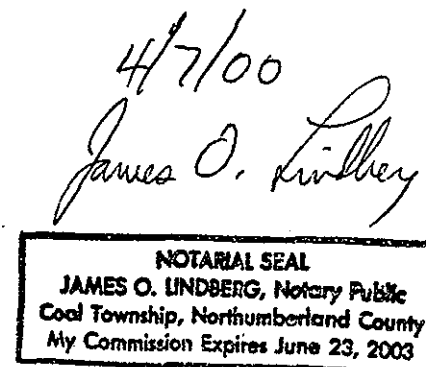
Respectfully submitted,

Brady L. Davis

Brady L. Davis
BX-3685

cc. State Representative John Myers
U.S. Court Judge Rambo

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DC-135A

ReturnCOMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF CORRECTIONS

INMATE'S REQUEST TO STAFF MEMBER

INSTRUCTIONS

Complete Items Number 1-7. If you follow instructions in preparing your request, it can be disposed of more promptly and intelligently.

214

1. TO: (NAME AND TITLE OF OFFICER)

Security, Capt. McAnaney

2. DATE

1-16-2000

3. BY: (INSTITUTIONAL NAME AND NUMBER)

Brady Davis, BX-3685

4. COUNSELOR'S NAME

5. WORK ASSIGNMENT

6. QUARTERS ASSIGNMENT

R.H.U. 214

7. SUBJECT: STATE COMPLETELY BUT BRIEFLY THE PROBLEM ON WHICH YOU DESIRE ASSISTANCE. GIVE DETAILS.

I received a misconduct 12-3-99, from phone monitor officer Henning. I am requesting a copy of that memorandum, so I may use it in my appeal's.

"I only need the written information of conversation,"
 Copy "from the tape"
 Thank You!

Brady Davis

8. DISPOSITION: (DO NOT WRITE IN THIS SPACE)

We do not provide this type of documentation to Inmates. Staff Members involved in the Appeal process can review this information in my office if they need to.

Received back 1-25-2000

☐ TO DC-14 CAR ONLY☐ TO DC-14 CAR AND DC-15 IRS

STAFF MEMBER

Capt. McAnaney

DATE